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REPLY TO MINNEAPOLIS

January 23, 2013

VIA ECF

The Honorable Ann D. Montgomery
United States District Court
13W U.S. Courthouse
330 South Fourth Street
Minneapolis, MN 55415

Re: *John Hancock Life Ins. Co., et al. v. Ally Financial Inc., et al.*
Case No. 0:12-cv-01841-ADM-TNL

Dear Judge Montgomery:

Per the stipulated and Court-approved briefing schedule, Plaintiffs will be responding to three motions to dismiss Plaintiff's Amended Complaint filed by certain Defendant groups on Friday, February 15, 2013. Pursuant to D. Minn. L.R. 7.1(f)(1)(D), Plaintiffs submit this letter seeking permission to file an omnibus brief which would exceed the word limit permitted by the Local Rules for one memorandum. *See* D. Minn. L.R. 7.1(f)(1)(A).

Currently, Plaintiffs are permitted to respond to two of the motions to dismiss (ECF No. 93 – Individual Defendants, and ECF No. 100 – Ally Defendants) with briefs containing up to 12,000 words and one (ECF No. 106 – Underwriter Defendants) with a brief containing up to 18,000 words.¹ Submitting an omnibus brief in response to all three outstanding motions to dismiss would permit Plaintiffs to consolidate arguments and avoid repetition. Plaintiffs respectfully request that the Court grant Plaintiffs leave to file an omnibus brief in response to Defendants' three motions to dismiss not to exceed 30,000 words (far less than the 42,000 total words permitted across the three individual briefs). Defendants do not oppose Plaintiffs' request.

¹ On December 12, 2012, the Court granted the Underwriters permission to exceed the 12,000 word limit by 6,000 words for a total of 18,000 words.

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Thank you for your consideration of this matter.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

A handwritten signature in blue ink that reads "Elizabeth R. Odette". The signature is written in a cursive style with a large, stylized 'E'.

Elizabeth R. Odette

ERO/brg

cc: All counsel of record (via ECF)